

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Troy Davis, Lynn James, Marvin Owens
(Deceased), Booker T. Brown (Deceased)
and Newton Williams, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

National Football League and NFL
Properties LLC, successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL BAP and BLACK CLIENTS OF
GPW

**MOTION FOR RELIEF UNDER ARTICLE XXVII OF THE SETTLEMENT
AGREEMENT**

Plaintiffs Troy Davis, Lynn James, Marvin Owens (Deceased), Booker T. Brown (Deceased), and Newton Williams, by their attorneys Goldberg, Persky & White, P.C., move for relief under Article XXVII of the Settlement Agreement. The Parties specifically seek enforcement of the terms of the Settlement Agreement. In support of their Motion, Plaintiffs rely on the points and authorities in the accompanying brief, which Plaintiffs submit herewith and incorporate herein in its entirety.

Plaintiffs respectfully request oral argument on this motion to fully address the issues experienced by Plaintiffs in particular, and all NFL class members in general.

Dated: 8/16/2022

Respectfully submitted,

/s/ Jason E. Luckasevic

Jason E. Luckasevic
Goldberg, Persky & White, P.C.
11 Stanwix Street
18th Floor
Pittsburgh, PA 15222
(412) 471-3980- phone
(412) 471-8308- fax

CERTIFICATE OF SERVICE

I hereby certify that on this August 16, 2022, I caused the foregoing MOTION FOR RELIEF UNDER ARTICLE XXVII, to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the above-captioned matter.

By: /s/ Jason E. Luckasevic
Jason E. Luckasevic